

August 22,2022

To: James Tucker

Chair

National Advisory Committee

From: Robert L. Santos

Director

U.S. Census Bureau

Subject: Recommendations and Comments to the U.S. Census Bureau from the

Robert L Sutos

National Advisory Committee 2021 Fall Meeting

The U.S. Census Bureau thanks the National Advisory Committee for its recommendations. We are responding to the committee recommendations submitted during its 2021 Fall Virtual Meeting on November 4-5, 2021.

Your feedback is welcomed to ensure that the Census Bureau continues to provide relevant and timely statistics used by federal, state, and local governments, as well as business and industry, in an increasingly technologically oriented society.

Attachment



To: Robert L. Santos

Director

U.S. Census Bureau

From: James Tucker

National Advisory Committee (NAC) Chair

Subject: Recommendations and Comments to the Census Bureau from the National

Advisory Committee – 2021 Fall Meeting

November 4-5, 2021

I. Administrative recommendations:

 RECOMMENDATION: The NAC recommends that the Census Bureau schedule a special meeting for February 2022 on the NAC Differential Privacy Working Group's deliverables for communications about the Disclosure Avoidance System (DAS) and differential privacy.

Census Bureau Response: The Census Bureau partially accepts this recommendation. The Census Bureau scheduled a special meeting with the NAC Differential Privacy Working Group in the Spring of 2022 to discuss the Working Group's deliverables related to the Disclosure Avoidance System (DAS) and differential privacy.

2. **RECOMMENDATION:** The NAC recommends that the Census Bureau include on the agenda for the proposed special meeting for February 2022 a presentation that responds to the questions posed by Thomas Saenz at the Fall 2021 NAC meeting, which are summarized below in Recommendation numbers 31 to 40.

Census Bureau Response: The Census Bureau accepts this recommendation. The Census Bureau developed an agenda for the special meeting in Spring 2022 that responded to the questions posed by Thomas Saenz at the Fall 2021 NAC meeting.

3. At its Spring 2021 meeting, the NAC made certain recommendations requesting that the 1997 OMB race and ethnicity standards be included on the agenda for the Fall 2021 NAC meeting. The NAC understands that the Census Bureau deferred adding that topic to the agenda, pending the confirmation of one or more members of the federal inter-agency working group. With the confirmation of incoming Director Rob Santos, the NAC believes those two recommendations are ripe for consideration:



a. RECOMMENDATION: The NAC recommends that the Spring 2022 NAC meeting include a presentation and discussion of the OMB decision on race categories, future plans on race categories for 2030 Census and other annual and periodic surveys, as well as the implications of reporting on 63+ race categories. The presentation also should include discussion of the consistency in the collection and dissemination in the race and ethnicity data between the 2020 decennial Census and subsequent Census surveys and products.

Census Bureau Response: The Census Bureau accepts this recommendation. Race and ethnicity are topics of considerable interest to the public, data users, and policy makers, and we look forward to continuously engaging in meaningful discussions about these topics with the NAC.

b. RECOMMENDATION: The NAC recommends that the Census Bureau include in the Spring 2022 NAC meeting agenda a discussion of the enumeration of Sexual Orientation and Gender Identity (SOGI) in Census surveys including the 2030 Census, ACS and other periodic and annual surveys.

Census Bureau Response: The Census Bureau accepts the recommendation. We welcome the opportunity to discuss SOGI measurement with the NAC, including the Census Bureau's collaboration with other agencies to explore the best practices of SOGI measurement, the process for adding content to Census Bureau surveys, the Census Bureau's experience collecting SOGI data and conducting research to support quality measurement, research needed to ensure quality of SOGI data, and technical considerations for expanding SOGI data collection at the Census Bureau.

4. Civil rights groups, Community Based Organizations and other stakeholders have expressed concerns that the use of the term "Hard-To-Count" population groups implies that it is the fault of those groups for being undercounted and the difficulty in counting them. The recent Executive Order on Advancing Equity has used the phrase "historically underserved, marginalized, and adversely affected" and a similar phrase should be adopted for Census communications.

RECOMMENDATION: The NAC recommends that the Census Bureau use the phrase "historically undercounted population groups" in place of "Hard-To-Count population groups," which is the phrase that will be used for the balance of these recommendations.

Census Bureau Response: The Census Bureau accepts this recommendation and will use that term in communications materials going forward.

5. **RECOMMENDATION:** The NAC recommends that the Census Bureau brief the NAC at its Spring 2022 meeting on the quality of the key administrative records sources used in the 2020 Census and other Census Bureau data collections, and how accurate and complete the administrative records and linkages are for historically undercounted population groups, such as persons of color and young children.

Census Bureau Response: The Census Bureau partially accepts this recommendation and added the topic of Administrative Records to the Spring 2022 meeting.

6. RECOMMENDATION: The NAC recommends that the Census Bureau begin planning for an in-person meeting of the NAC in the D.C. Metro area for its Spring 2022 meeting that is to be consistent with CDC guidelines for in-person events and to make plans for a hybrid option for any members unable to travel.

Census Bureau Response: The Census Bureau will consider this recommendation. All in-person meetings will be planned consistent with CDC and local guidelines in consultation with Census Bureau leadership. If an in-person meeting is deemed safe, we will offer a virtual option for Committee members unable to travel.

General recommendations:

7. Some of the requests for information that NAC members have sent to the Federal Advisory Branch to communicate to Subject Matter Experts (SME) at the Census Bureau have gone unanswered or there have been delays in the response from the Federal Advisory Branch. Documenting the requests also will assist the Federal Advisory Branch in tracking its compliance with the requirements of the Federal Advisory Committee Act (FACA).

RECOMMENDATION: The NAC recommends that the Federal Advisory Branch document all requests from NAC members or NAC Working Groups to include the following information: the date the request was received; the person or Working Group making the request; a summary of the request; the SME to whom the request is addressed; and the date the Federal Advisory Branch completed its response to the request.

Census Bureau Response: The Census Bureau accepts this recommendation. The Advisory Committee Branch will continue to develop internal tracking mechanisms to ensure inquiries and requests are met in a timely manner.

8. RECOMMENDATION: The NAC recommends that wherever practicable, the Federal Advisory Branch respond to NAC member or NAC Working Group requests to communicate with SME within 10 business days after receipt of request.

Census Bureau Response: The Census Bureau partially accepts this recommendation. The current Standard Operating Procedures outline a stakeholder response or acknowledgement practice of 48 hours. The Advisory Committee Branch will work toward meeting this standard.

Recap of the 2020 Census Integrated Communications:

9. During the 2020 decennial Census, communications from the Bureau were marred by messaging issued by political appointees to support the Bureau's position in the timeline litigation. Other releases downplayed the impact that efforts to expedite the count to end field operations before October 31, 2020 were having on data quality and operational goals for Non-Response Follow-up. Non-partisan operations are imperative to the integrity of Census programs and to building and maintaining trust, especially with historically undercounted population groups.

RECOMMENDATION: The NAC recommends that the Associate Director of Communications position, which currently is staffed by a political appointee not requiring Senate confirmation, be re-designated as a career professional staff position.

Census Bureau Response: The Census Bureau does not accept this recommendation as it does not have the authority to make this change. In addition, the Associate Director for Communications position does not require Senate confirmation.

10. RECOMMENDATION: The NAC recommends that the Census Bureau publish a Federal Register Notice soliciting public comment on the development of guidelines for the Bureau's public communications about Census operations to ensure communications are nonpartisan and are effective at messaging to reach all households, including historically undercounted population groups.

Census Bureau Response: The Census Bureau is unable to accept this recommendation as written. There are existing policies at the Census Bureau and across the federal government that guide statistical agency communications guidelines, including Statistical Policy Directives. The Census Bureau uses research like the Census Barriers Attitudes and Motivators Study (CBAMS) to build communications that will reach all households including historically undercounted population groups. For large efforts, it also tests its messages and creative to ensure it resonates with target audiences.

11. RECOMMENDATION: The NAC recommends that the Census Bureau engage in consultations with national partners to assess the effectiveness of the 2020 Census integrated communications plan including: Base 2.0 plan, adjustments to that plan

resulting from the COVID-19 pandemic. Effectiveness data should be presented by assessing the effectiveness of reaching historically undercounted population groups.

Census Bureau Response: The Census Bureau accepts this recommendation.

12. RECOMMENDATION: The NAC recommends that the Census Bureau develop and implement a survey of language groups not included among the languages covered by Census communications to assess the impact that the lack of language materials and information had on participation in the 2020 Census by households in non-covered language groups.

Census Bureau Response: The Census Bureau is unable to accept this recommendation as written. We are planning a robust 2030 Census program guided by thorough data-driven planning. As you know, language use evolves over the decade, and those changing needs must be incorporated into our planning. We will analyze annual ACS estimates throughout the decade to monitor language needs and identify ways to reduce language barriers. This analysis will be the foundation for determining the optimal level of 2030 Census language support.

13. RECOMMENDATION: The NAC recommends that the Census Bureau hold consultations with national, state, local and tribal partners to obtain detailed information about the communications and outreach campaigns carried out by those partners in the 2020 Census and in ongoing and periodic surveys, including the extent to which those partners address gaps in communications efforts by the Census Bureau and the effectiveness of those efforts.

Census Bureau Response: The Census Bureau accepts this recommendation and notes that this conversation already is underway. Our tribal affairs and field division representatives have met with our tribal partners to discuss their 2020 Census outreach and communications work and their resultant 2030 Census recommendations.

14. During the 2020 Census field operations, many Census partners were able to use geofencing (the targeted use of pushing out data to cell phones by geographic area) to communicate culturally and localized messaging about updates to decennial operations in a much more timely and effective manner than the Census Bureau. For example, following the United States Supreme Court's decision to grant a stay to the Census Bureau in *National Urban League v. Ross*, three Native American organizations, the National Congress of American Indians, the Native American Rights Fund, and the Native American Voters Alliance, conducted a 48-hour geofencing campaign targeted at only low self-response tribal areas and reservations in Arizona, Montana, New Mexico, North Dakota and South Dakota to inform Native American

households that Census data collection was ending in two days, resulting in a measurable increase in self-responses from those areas.

RECOMMENDATION: The NAC recommends that the Census Bureau hold consultations with national, state, local and tribal partners to obtain detailed information about the partners' use of geofencing to reach historically undercounted population groups, and that the Bureau report how it intends to use the lessons learned from those partner activities to improve the Bureau's use of geofencing for future Census surveys.

Census Bureau Response: The Census Bureau accepts this recommendation and looks forward to hearing from tribal partners about their geofencing work.

- **15. RECOMMENDATION:** The NAC recommends that the Census Bureau develop and implement a Census Barriers, Attitudes and Motivators (CBAMs) study to examine barrier to self-responses by historically undercounted population groups for topics including:
 - a. Perception and level of trust of the Census Bureau;
 - b. Concerns about politicization of Census surveys and the Census Bureau; and
 - c. Views on whether the Census Bureau is committed to counting all people in the United States, regardless of citizenship status, age, race, ethnicity, persons with disability.

Census Bureau Response: The U.S. Census Bureau is developing a nationally representative panel to provide rapid insight on changes in the population, called the Census Pulse Panel. The goal of this panel is to be nationally representative, including historically underrepresented populations, and ready to respond to surveys repeatedly over time. One of the use cases of the Census Pulse Panel will be to conduct CBAMS surveys throughout the decade. As this program is built, we will examine the topics listed in 15a-c for inclusion in the panel.

16. **RECOMMENDATION:** The NAC recommends that the Census Bureau share relevant benchmarks, goals, historic and 2020 actuals for Key Performance Indicators (KPIs) like Click Through Rate (CTR) Conversion Rate, etc. for advertising tactics to evaluate the performance and effectiveness of the Integrated Communication Plan. Metrics and actuals should be broken down by audience segment and historically undercounted populations.

Census Bureau Response: The Census Bureau accepts this recommendation. The Census Bureau is in the process of conducting assessments of 2020 Census operations, including the integrated partnership and communications work. Please note that the same metrics do not apply for all types of advertising. In addition, we cannot quantify and measure many important and motivating activities, like the work of trusted voices. Click-Through Rates are only applicable to digital advertisements and other digital activations. The rates measure a user's click into the online response website, not their completion of the online form. Additionally, click-through rates cannot be segmented by audience or historically undercounted population. Traditional advertising measures like radio, TV and print are measured in reach and frequency (see chart below). Because the analytical points are different for different channels, they should not be compared directly to each other. Viewing response rates in tandem with any metrics also is important in painting a picture of the campaign's success.

2020 Reach and Frequency Numbers

2020 Census Phase	Weeks	Reach/Frequency
Awareness	HUP Audiences: 9 weeks	
		99.8% 26.8x
(1/14 - 3/12)	Diverse Mass: 4 weeks	
Extended Motivation	HUP Audiences: 20 weeks	
		99.99% 323.2x
(3/13-8/2)	Diverse Mass: 20 weeks	·
Reminder	HUP Audiences: 9 weeks	
		99.7% 15.7x
(8/3-9/27)	Diverse Mass: 9 weeks	

^{*}HUP = Historically Undercounted Population

17. **RECOMMENDATION:** The NAC recommends that the Census Bureau provide an analysis of the effectiveness of adding 34 in-language creative assets and executions on increasing Response Rates overall and particularly for the respective audience groups.

Census Bureau Response: The Census Bureau partially accepts this recommendation. An assessment of the 2020 digital advertising campaign includes whether ads created for specific target audiences were used by those target audiences for internet self-response.

18. **RECOMMENDATION:** The NAC recommends that if the incremental 34 in language creative assets and executions proves a positive impact on response rate they be adopted as standard – base plan languages in addition to the original 13 languages for the 2030 Census and other Census Bureau products and surveys.

Census Bureau Response: The Census Bureau is unable to accept this recommendation. For the 2030 Census, we are adopting a more flexible, adaptive strategy. The Census Bureau expects to "decouple" the decision about languages for the communication plan from decisions about languages for data collection instruments. The Census Bureau plans to analyze the 2020 Census data and examine mid-decade language data to inform what languages are needed to support communications and data collection instruments for the 2030 Census. We believe this strategy allows a better alignment to the nation's language needs than that of making final decisions on language today. The final approach does not necessarily dismiss the set of languages in the NAC recommendation. We think it is better to select languages for specific strategies at a time that is closer to 2030 and based on more contemporaneous information.

19. **RECOMMENDATION:** The NAC recommends that the Census Bureau conduct Market Mix Modelling or similar analysis to ascertain impact and calculate the general Return On Investment (ROI) of the advertising channels used in the Integrated Communication Plan. Findings and Metrics should be broken down by audience segment and historically undercounted populations.

Census Bureau Response: The Census Bureau accepts this recommendation. The Census Bureau is in the process of conducting assessments of all 2020 Census operations, including the integrated partnership and communications work.

Please note that the same metrics do not apply for all types of advertising. In addition, we cannot quantify and measure many important and motivating activities, like the work of trusted voices. Click-Through Rates are only applicable to digital advertisements and other digital activations. The rates measure a user's click into the online response website, not their completion of the online form. Additionally, click-through rates cannot be segmented by audience or historically undercounted population. Traditional advertising measures like radio, TV and print are measured in reach and frequency (see chart below). Because the analytical points are different for different channels, they should not be compared directly to each other. Viewing response rates in tandem with any metrics also is important in painting a picture of the campaign's success.

20. **RECOMMENDATION:** The NAC recommends that the Census Bureau Trust and Safety Team perform an analysis of the reported cases of mis- and disinformation around the 2020 Census to identify major salient themes including a breakout by population targeted by mis- and disinformation.

Census Bureau Response: The Census Bureau partially accepts this recommendation. We know that disinformation largely was geared toward discouraging people from responding to the 2020 Census. We saw misinformation around a variety of points, including what questions were on the form as well as privacy and confidentiality

considerations. The Census Bureau is unable to break out misinformation and disinformation by populations targeted. We do not have access to social media user accounts to evaluate who engaged with posts, but one could assume a general target population of mis/disinformation based on the language in which the content is created. Misinformation and disinformation exist in non-digital mediums, including word-of-mouth communications and paper flyers. Additionally, digital content often is limited to closed online groups. While we have strategies to combat misinformation and disinformation, we are not able to evaluate target populations in a meaningful way.

21. **RECOMMENDATION:** The NAC recommends that the Census Bureau conduct an analysis of the Messaging used in the ICP to inform best practices for deployment moving forward. Best practices should include all audience segments and historically undercounted populations.

Census Bureau Response: The Census Bureau accepts this recommendation. As we plan for the 2030 Census, we will take into account all 2020 Census evaluations and analyses, including best practices for messaging for all audience segments and historically undercounted populations.

22. **REQUEST FOR INFORMATION:** The NAC requests that the Census Bureau share the general performance data of the 110+ custom landing pages, KPIs and factors that drove success. Factors driving success can be reported by audience segment and historically undercounted populations.

Census Bureau Response: The Census Bureau is unable to accept this recommendation. We did not track who visited the site. As a result, we are unable to report by audience segment or historically undercounted population. Regarding our 50+ translated language versions of the landing page, about three-quarters of a million visits included one of the landing pages that was not an English or Spanish version and less than 1% of homepage visits included a landing page translated into any other language. We also offered a personalization experience where we displayed a different, geography-specific "hero image" of a city skyline based on the user's general location. This experience was served to a randomly-selected 50% of visitors and was restricted to the image. Otherwise, the landing page was identical to the general landing page. These images were set up for 50 states; Washington, D.C.; Puerto Rico; and six cities. In some cases, this was set up to occur on both English & Spanish pages. We do not have the requested metrics for those pages.

23. **RECOMMENDATION:** The NAC recommends that the Census Bureau report to the NAC on how it intends to adjust its integrated communications plan for Census 2030 in specific response to detailed data on differential undercounts experienced by specific groups in Census 2020.

Census Bureau Response: The Census Bureau accepts this recommendation and will provide information about plans for the 2030 Census ICP after [the plans are or the ICP is] developed.

24. **RECOMMENDATION:** The NAC recommends that the Bureau evaluate whether it should adjust its future integrated communications plan to include development of Englishlanguage communications targeted at the Latino community in light of that community's size, anticipated growth, and differential undercount.

Census Bureau Response: The Census Bureau accepts this recommendation and will incorporate this recommendation into 2030 planning. We note that there was English-language creative for the Latino community as part of our 2020 Census campaign.

Racial and Ethnic Diversity in the United States: Highlights from the 2020 Census:

25. **RECOMMENDATION:** The NAC recommends that the Census Bureau report the findings of its testing of how race and ethnicity are ordered in the survey instruments to determine whether or not the design of the race and ethnicity combined question affects the responses that respondents give (e.g., question design bias).

Census Bureau Response: The Census Bureau partially accepts this recommendation from the National Advisory Committee. The race and ethnicity categories in the versions of the combined race and ethnicity question that were tested in the 2015 National Content Test were ordered in population size order. Additionally, the detailed checkboxes and examples in the combined question represent the broad diversity within each OMB racial and ethnic group and were ordered by population size.

Testing has not been conducted to evaluate how the order of the categories in a combined race and ethnicity question affects self-response. Previous testing using the separate two-question format for race and ethnicity revealed that it was problematic to list the groups in alphabetical order, as many respondents (upon seeing the first alphabetical category, "American Indian or Alaska Native") checked the box upon seeing the word "American." We remain committed to improving the accuracy and reliability of census results by analyzing how respondents self-identified to the questions on race and ethnicity in the 2020 Census and continuing to research approaches that more accurately measure and reflect how people self-identify.

26. RECOMMENDATION: The NAC recommends that the Census Bureau evaluate and report its findings of the extent to which non-Hispanic Whites were overreported in the 2020 Census because the 1997 OMB Race and Ethnicity Standards limited the ability of survey respondents of Middle Eastern or North African origin (MENA) to choose their reporting category.

Census Bureau Response: The Census Bureau is unable to accept this recommendation as written. Although the Post-Enumeration Survey reports will contain net coverage rates for non-Hispanic Whites, the survey was not designed to address this recommendation. No current evaluations are able to address this recommendation.

27. RECOMMENDATION: The NAC recommends that the Census Bureau evaluate and report its findings about the extent to which the 2020 Census underreported the number of persons of Hispanic origin because of confusion from the survey instrument and instructions over the differences between the race and ethnicity categories, self-identification with a particular racial category regardless of the respondent's Hispanic origin (such as American Indians of Hispanic descent who identify only as American Indians, or persons from Caribbean nations of Hispanic descent who only identify as Black).

Census Bureau Response: The Census Bureau is unable to accept this recommendation as written. Although the Post-Enumeration Survey reports will contain net coverage rates for people of Hispanic origin, the survey was not designed to address this recommendation. No current evaluations are able to address this recommendation.

28. **RECOMMENDATION:** The NAC recommends that the Census Bureau rectify the invisibility of certain Middle Eastern/North African (MENA) populations (such as persons of Somalian or Sudanese origin) by developing a MENA ethnic category definition that crosses existing racial code designations.

Census Bureau Response The Census Bureau is unable to accept this recommendation. The U.S. Census Bureau collects race and ethnicity data in accordance with the 1997 Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity directed by the U.S. Office of Management and Budget (OMB). The Census Bureau, and all other Federal statistical agencies, must adhere to the 1997 OMB Standards. The 1997 OMB Standards define "White" as "A person having origins in any of the original peoples of Europe, the Middle East, or North Africa." Therefore, any MENA responses, such as Egyptian or Lebanese, are classified as White. Responses are based on self-identification.

We remain committed to improving the accuracy and reliability of census results by researching approaches that more accurately measure and reflect how people self-identify, including people of Middle Eastern and North African (MENA) heritage. Census Bureau experts will evaluate the results of the 2020 Census ethnicity and race data and consult with advisors, stakeholders, and our colleagues at OMB and Federal statistical agencies on potential new areas for future research, including revisiting our current classification of MENA.

We understand and support the critical need for providing detailed disaggregated data from the decennial census. The Census Bureau is currently developing the plans for 2020 Census data products, including producing detailed data for all groups for the very first time as part of the Detailed Demographic and Housing Characteristics File. We are planning to provide detailed population counts and characteristics from the 2020 Census for all detailed disaggregated groups, including populations such as persons who identify as Somalian or Sudanese. As this important work continues, we will be communicating the plans and seeking feedback from the NAC.

29. **RECOMMENDATION:** The NAC recommends that the Census Bureau provide an analysis and findings and suggested steps to address the continued increase and large number of "some other race" responses in the 2020 Census despite improvements to the race question. Furthermore, to better understand the composition of these residual responses, the NAC requests a summary breakdown of SOR responses by how they were recoded into aggregate sub-race and/or Hispanic origin categories.

Census Bureau Response: The Census Bureau partially accepts this recommendation. The 2020 Census used two separate questions for collecting data on race and ethnicity, as required by the 1997 OMB Standards. Our research shows that when using separate questions, some respondents, particularly those who identify as Hispanic or Latino, have difficulty responding to the race question and identifying with one of the OMB race categories, leading to an increase in the Some Other Race (SOR) population. When Hispanics have an opportunity to choose Hispanic as their category in a combined question approach, the SOR identification drops down to the residual response group that it was intended to be.

We remain committed to improving the accuracy and reliability of census results by analyzing how respondents self-identified to the questions on race and ethnicity in the 2020 Census and continuing to research approaches that more accurately measure and reflect how people self-identify. Census Bureau experts will continue to evaluate the results of the 2020 Census ethnicity and race data, and we will communicate additional analyses and findings with the NAC in the future.

The Census Bureau is currently developing the plans for 2020 Census data products, including producing data for detailed Some Other Race groups such as Brazilian, Cabo Verdean, etc. as part of the Detailed Demographic and Housing Characteristics File. As this important work continues, we will be communicating the plans and seeking feedback from the NAC.

30. **RECOMMENDATION:** The NAC recommends that the Census Bureau provide an analysis of the "some other race" responses in the 2020 Census by mode (online, mail, phone, home).

Census Bureau Response: The Census Bureau accepts this recommendation. We remain committed to improving the accuracy and reliability of census results by analyzing how respondents self-identified to the questions on race and ethnicity in the 2020 Census and continuing to research approaches that more accurately measure and reflect how people self-identify. Census Bureau experts will continue to evaluate the results of the 2020 Census ethnicity and race data, and we will communicate these analyses and findings with the NAC in the future.

<u>2020 Census Data Products and Stakeholder Engagement Plans - Subtopics: Demographic and Housing Characteristics File (DHC) Update and Detailed Demographic and Housing Characteristics File (DHC) Update:</u>

- 31. **RECOMMENDATION:** The NAC recommends that the Census Bureau report to the NAC on the lessons learned of its stakeholder engagement and tribal consultations on the application of the Disclosure Avoidance System (DAS) and differential privacy to the P.L. 94-171 redistricting data, and report to the NAC on its findings before February 1, 2022, to include:
 - a. The extent to which the Census Bureau's *Federal Register* Notices about DAS and differential privacy resulted in stakeholder feedback desired by the Bureau;

Census Bureau Response: The Census Bureau accepts this recommendation.

- The extent to which the use of jargon and technical terms impeded communications to stakeholders, data users and the public about the DAS and privacy measures being implemented by the Bureau;
 - Census Bureau Response: The Census Bureau appreciates the extended conversations it has had with stakeholders in recent months about the ways in which it can improve communications around topics related to disclosure avoidance and privacy. While we've made significant progress in the outreach we conduct around this topic via regular webinars, newsletters and other stakeholder and data user engagement, we continue to refine the ways in which we communicate around this subject. We are committed to balancing accurate reflections of technical and statistical information with readability. We appreciate stakeholders' and data users' patience and diligence in working with us to identify and improve specific points of confusion and refine our messaging, a process which continues today.
- c. The effectiveness, objectivity, and accuracy of press reporting on the Census Bureau's efforts to implement the DAS and privacy measures to the 2020 Census;

Census Bureau Response: The Census Bureau regularly works with the media to educate reporters on our work and answer their questions. We do not have a role in determining the content or ensuring the objectivity of any reports, but we do point out inaccuracies when they are present.

d. The extent to which all the Census Bureau's outreach accurately identified all known priority use cases;

Census Bureau Response: The Census Bureau is unable to accept this recommendation as written. Our outreach prompted many stakeholders, data users and members of the public to provide uses cases for PL 94-171 data. Those uses cases complemented the Census Bureau's existing catalogue of use cases to inform the final decisions around how the disclosure avoidance system was applied to the data. However, we do not possess a way to accurately identify all known use cases.

e. The feedback received from stakeholders and how their recommendations impacted the final decisions made on the algorithm and privacy loss budget;

Census Bureau Response: The Census Bureau accepts this recommendation.

f. The impact that the timing of decisions on the DAS and differential privacy had on the range of consultation and stakeholder engagement the Census Bureau would have preferred to do; and

Census Bureau Response: The Census Bureau accepts this recommendation.

g. What the lessons learned are from the Census Bureau's outreach and consultations, and how those lessons can be applied to future stakeholder engagement including to the DHC file.

Census Bureau Response: We are already applying lessons learned from initial 2020 Census disclosure avoidance conversations to the strategy for engaging the public, data users and stakeholders around the Demographic and Housing Characteristics (DHC) and the Detailed Demographic and Housing Characteristics (Detailed DHC) files. More information will be forthcoming about dedicated external engagement sessions.

32. **RECOMMENDATION:** The NAC recommends that the Census Bureau apply DAS and differential privacy to the DHC and DDHC in a matter that allows for accurate data on smaller populations, including at the sub-county and tribal area level.

Census Bureau Response: The Census Bureau is unable to accept this recommendation at this present time. The accuracy of data on smaller populations at sub-county and tribal area levels will be the result of tuning of the disclosure avoidance system and the allocation of privacy loss budget by the Data Stewardship Executive Policy Committee (DSEP).

33. **RECOMMENDATION:** The NAC recommends that the Census Bureau explain the impact of decoupling the redistricting file and the DHC file for the goal of making the 2020 Census data more accurate.

Census Bureau Response: The Census Bureau accepts this recommendation.

34. **RECOMMENDATION:** The NAC recommends that the Census Bureau report on outreach to other federal agencies to include: the input the Bureau received from federal agencies on the use of census data in funding formulas for federal programs; and the guidance that the Census Bureau provides to those agencies on limitations and uses of that data, including limitations due to data quality issues.

Census Bureau Response: The Census Bureau accepts this recommendation.

35. Undercounts are much more likely in certain areas and with historically undercounted populations.

RECOMMENDATION: The NAC recommends that the Census Bureau oversample rural, tribal and other geographically isolated populations in future Post-Enumeration Surveys (PES) to improve the accuracy of assessing undercounts in those areas.

Census Bureau Response: The Census Bureau is unable to accept this recommendation as written. We do plan to research improvements to the Post-Enumeration Survey design. Please note that the 2020 Post-Enumeration Survey oversampled blocks in American Indian Country and in areas with high home renter rates.

36. **RECOMMENDATION:** The NAC recommends that the Census Bureau create a catalog of all federal or state statutorily or regulatorily required uses of data from the DHC and/or DDHC, and consider that catalog, in addition to feedback solicited from stakeholders, as it completes its decision-making with the Data Stewardship Executive Policy Committee (DSEP) on the application of the DAS to DHC and DDHC.

Census Bureau Response: The Census Bureau thanks NAC for this recommendation however is unable to accept this recommendation as written. The Census Bureau agrees that collecting, curating, and synthesizing a comprehensive set of data use cases for census data assists decision-making regarding the census. The Census Bureau agrees to build a repository of use cases and looks forward to updating the committee on our

progress. This repository may not be complete in time for decisions about the DHC or Detailed DHC, but the information that is available will be considered along with feedback already received. Additionally, the Census Bureau is proud to announce the establishment of a new enterprise level office to continue national partnerships throughout the decade.

37. **RECOMMENDATION:** The NAC recommends that the Census Bureau engage in discussion/dialogue with appropriate congressional leadership on the new DAS for 2020 Census to include: a) the impact of private, third-party "Big Data" on Census disclosure avoidance and the Bureau's Title 13 confidentiality-protection obligations; b) any differences in the privacy value or confidentiality-protection imperative with respect to different Census-collected data points (e.g. race, sex, age, etc.); and c) recommendations to modify any statutorily mandated uses of DHC or DDHC data or any statutorily mandated data releases in response to the new DAS for Census 2020.

Census Bureau Response: The Census Bureau accepts this recommendation, to the extent that we will brief Congress on Census Bureau-related topics. We brief key congressional stakeholders regularly and have had, and will continue to have, dedicated conversations around the 2020 Census disclosure avoidance system.

38. **RECOMMENDATION:** The NAC recommends that the Census Bureau revisit its decision to ensure data consistency between PL 94-171 and DHC data releases to determine if abandonment of that decision would appreciably increase the accuracy of DHC data release.

Census Bureau Response: The Census Bureau accepts this recommendation. This will be part of the experiments informing decisions by the Data Stewardship Executive Policy Committee (DSEP).

39. **RECOMMENDATION:** The NAC recommends that the Census Bureau evaluate its education and public engagement efforts on DAS and its application to the PL 94-171 release with respect to three different audiences: a) stakeholders/ data users; b) Members of Congress and other policymakers; and c) general public, and that the Bureau report on its evaluation to the NAC, including how its evaluation has altered plans with respect to education / engagement on DAS in application to the DHC and DDHC.

Census Bureau Response: The Census Bureau accepts this recommendation and will report at a future NAC meeting on its education and public engagement efforts on the DAS, including the audiences named. We have been actively engaging with all of our audiences around our disclosure avoidance system work in an effort to educate about the application of differential privacy to the 2020 Census data. For example, we have released 35 2020 Census Data Products Newsletters since May 2020 and held 11 Disclosure Avoidance Webinars in 2021 with more to come. We conduct regular briefings with stakeholders and Congress and have made communicating with everyone a priority

through our <u>Disclosure Avoidance Blog</u> series which totals 15 on this topic. We have also appreciated the extensive feedback given by stakeholders in response to our requests for their feedback on five sets of "demonstration data" that showed different ways differential privacy's privacy/accuracy balance could be applied using 2010 Census data as an example data set. A sixth set of demonstration data informed all of our audiences of the final privacy/accuracy budget. The Census Bureau has also released a <u>variety of materials</u> including <u>fact sheets</u>, a handbook and a video explaining differential privacy for all of our audiences.

40. RECOMMENDATION: The NAC recommends that the Census Bureau produce a timeline and plan for the timely release of DDHC data by detailed racial/ethnic subgroup in order to enable compliance with health/safety obligations of stakeholders, especially in light of decisions made with respect to 2020 ACS data. The plan for timely and accurate DDHC data should include proactive outreach to stakeholders, and sufficient time for stakeholders to provide feedback on priority tables and delivery formats.

Census Bureau Response: The Census Bureau accepts the recommendation to produce a timeline for the release of the DDHC. The Census Bureau is currently developing a timeline for the release of the DDHC. We will continue to keep data users and stakeholders informed about the status of the DDHC as we continue to develop our plans and timelines.

Recent Challenges to Data Collection – Subtopics: The Current Population Survey Experience 2020/2021; The American Community Survey Experience for 2020 Data; and The Economic Data Survey Experience 2020:

41. **RECOMMENDATION:** The NAC recommends that the Census Bureau evaluate the impact that interruptions to ACS operations have on the quality of ACS data, including one-year and five-year estimates and data used for coverage determinations under Section 203 of the Voting Rights Act.

Census Response: The Census Bureau accepts this recommendation. We are working to evaluate and mitigate any impacts that interruptions to the ACS operations may have had on the quality of the ACS data. In conducting that work, we are paying special attention to those statutory uses for the ACS data, such as the Section 203 determinations, to ensure that any remedies identified allow us to provide data of the quality expected from the Census Bureau. The results of this evaluation and any actions taken will be considered when developing the schedule and methodology for the creation of the 2026 Section 203 determinations.

42. **RECOMMENDATION:** The NAC recommends that the Census Bureau evaluate the feasibility of producing experimental tables for the 2020 ACS one-year file for counties with populations of 65,000+.

Census Response: The Census Bureau accepts this recommendation. We acknowledge that many data users are interested in substate geographies such as counties and we will need to evaluate the extent to which the experimental weights will support such estimates and for which areas. However, currently our primary focus is on improving the estimation methods for the 2016-2020 ACS 5-year estimates. The geographies released for the 1-year experimental estimates can be evaluated as time and resources permit.

43. **RECOMMENDATION:** The NAC recommends that the Census Bureau request that the Commerce Department's proposed budget include increased funding from Congress for ACS operations and the new Office of Strategic Alliances, to include expanded media communications and outreach, enhanced language access, permanent partnership specialists, and increased sample size.

Census Bureau Response: The Census Bureau will consider this recommendation in future budget requests, but we cannot commit at this time to specific proposals.

44. **RECOMMENDATION:** The NAC recommends that the Census Bureau direct the new Office of Strategic Alliances to develop an integrated partnership and communications program for the ACS to include permanent partnership specialist staff, expanded outreach and communications and improved education to the public about the importance of the ACS.

Census Bureau Response: Thank you for your recommendation. The Office of Strategic Alliances (OSA) is currently working very closely with ADCOM in developing initiatives around the Executive Order on Data Equity to develop relationships and educational activities specifically targeted to organizations serving to historically undercounted populations. We understand that this effort should positively affect the American Community Survey (ACS). In addition, OSA is paying particular attention to these populations while trying to accomplish this fiscal year's funded goals of disseminating 2020 Census data and educating businesses in responding to the 2022 Economic Census. Furthermore, OSA is currently working on a strategic action plan that will include working with the American Community Survey Office to implement a series of tactics to benefit of ACS.

45. **RECOMMENDATION:** The NAC recommends that the Census Bureau direct the new Office of Strategic Alliances to convene workshops with stakeholders, Tribes and Community Based Organizations (CBOs) to develop a program for a Census-private-business partnerships focusing on historically undercounted population groups to improve education, publicity, outreach and participation in the ACS.

Census Bureau Response: Thank you for your recommendation. OSA is currently working very closely with ADCOM in developing initiatives around the Executive Order on Data Equity to develop relationships and educational activities specifically targeted

to organizations serving historically undercounted populations. In addition, OSA is paying particular attention to these populations while trying to accomplish this fiscal year's main goals of disseminating 2020 Census data and educating businesses in responding to the 2022 Economic Census.

46. RECOMMENDATION: The NAC recommends that the Census Bureau evaluate barriers to completing the ACS survey, including but not limited to: survey length; method of dissemination of the survey; communications about the survey; language accessibility for LEP respondents or linguistically isolated households; lack of access to affordable broadband; lack of reliable mail service; lack of access to phone service; distrust of the government; etc.

Census Response: The Census Bureau accepts this recommendation, and will continue working to advance the ACS, by conducting the survey through multiple modes (internet, paper, in-person, and telephone interviews) and offering support and interviewing in multiple languages. Over time, the Census Bureau has undertaken various research projects to improve the ACS survey.

The Census Bureau conducted cognitive tests with ACS respondents to understand their experience completing the survey. This study asked questions about respondents' experiences taking the survey, including questions about the length of the interview (Holzberg, Katz, and Davis, 2021)¹.

The ACS continuously researches and assesses messaging about the survey with respondents and has specifically focused on respondents who have a distrust of the government (Orrison and Ney, 2014)². For example, the Strategic Framework Project is a multi-stage research plan to understand best practices in survey communications (drawing on decennial work as well as other survey and communications literature) (Oliver, Heimel, Schreiner, 2017)³, analyzing current messaging (Schreiner, Oliver, Poehler, 2020)⁴, and developing and testing new materials and messages.

¹ Holzberg, J, Katz, J, and Davis, M. (2021) "Measuring Respondents' Perceptions of Burden in the American Community Survey (ACS)" https://www.census.gov/library/working-papers/2021/adrm/rsm2021-04.html

Orrison, G. and Joseph, N. (2014). "ACS Messaging Research: Deliberative Focus Groups with Stakeholders Who Are Distrustful of the Government."

https://www.census.gov/library/working-papers/2014/acs/2014_Orrison_01.html Oliver, B, Heimel, S, and Schreiner, J (2017). "Strategic Framework for Messaging in the ACS Mail Materials" https://www.census.gov/library/working-papers/2017/acs/2017 Oliver_01.html

Shreiner, J, Oliver, B, and Poehler, E. (2020). "Assessment of Messaging in the 2018 American Community Survey Mail Contact Materials." https://www.census.gov/library/working-papers/2020/acs/2020 Schreiner 01.html

The Census Bureau recently tested modifying the self-response mailing strategy in areas where internet access is lacking (Longsine and Risley, 2019)⁵. The Census Bureau plans to re-evaluate the data collection strategy for areas with low internet access based on lessons learned from the 2020 Census, as well as data collection strategies for Spanish-speaking respondents.

The Census Bureau expects to continue to evaluate and test various methods for completing the ACS.

47. **RECOMMENDATION:** The NAC recommends that the Census Bureau include categories for MENA ethnicity and Sexual Orientation and Gender Identity (SOGI) in the American Community Survey in advance of the decennial survey.

Census Bureau Response: The Census Bureau appreciates this recommendation but is unable to accept it as written.

We remain committed to improving the accuracy and reliability of data on race and ethnicity by researching approaches that more accurately measure and reflect how people self-identify, including people of Middle Eastern and North African (MENA) heritage.

The process for reviewing the standards on race and ethnicity is determined by the U.S. Office of Management and Budget (OMB). The U.S. Census Bureau collects race data in accordance with the 1997 Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity directed by the U.S. Office of Management and Budget (OMB). The Census Bureau, and all other Federal statistical agencies, must adhere to the 1997 OMB Standards. The 1997 OMB Standards define "White" as "A person having origins in any of the original peoples of Europe, the Middle East, or North Africa." Therefore, any MENA responses, such as Egyptian or Lebanese, are classified as White. Responses are based on self-identification. As you are aware, OMB's 1997 Standards were not revised this past decade. Therefore, the race and ethnicity question on the American Community Survey will continue to follow a two-question format for collecting data on race and ethnicity, and there will not be a separate Middle Eastern or North African category.

The Census Bureau is actively working with federal statistical agencies and others on how best to measure gender identity and sexual orientation. Because responding to the American Community Survey is mandatory and already a lengthy survey, there are strict criteria for adding new questions. There must be a mandatory or required need for the

Longsine, L, and Risley, M. (2019) https://www.census.gov/library/working-papers/2019/acs/2019 Longsine 01.html

data at low levels of geography or for small populations, and no data available at the necessary levels of geography from another source. At any time, federal agencies can initiate the process for adding new questions by demonstrating a statutory or regulatory need for the data.

Demographic Characteristics of Business Owners:

48. Both the Annual Small Business Survey (ABS) and the Non-Employer Statistics by Demographics (NES-D) provide important information for business owners. However, there is a gap between the type and quality of data they report. ABS is a survey but the NES-D relies solely on administrative data. As a result, the NES-D data does not present a complete picture of minority owned businesses since more than 80% of minority-owned businesses are non-employer firms.

RECOMMENDATION: The NAC recommends improving the ABS and NES-D by adding a survey component to the NES-D, over-sampling minority businesses in both the ABS and NES-D to ensure an understanding of each segment and ensure that language is not a barrier to participation or access by respondents.

Census Bureau Response: Thank you for these recommendations. ABS currently oversamples minority businesses by using multiple sources of information to estimate the probability that a business was minority- or women-owned. These probabilities are then used to place each firm in the ABS universe in one of the 9 frames for sampling. These frames are American Indian and Alaska Native, Asian, Black or African American, Hispanic, Non-Hispanic White Men, Native Hawaiian and Other Pacific Islander, Other, Publicly-owned, and Women. This process ensures that we have representation of all groups for the ABS sample. NES-D is not a survey; rather, it assigns demographic characteristics to the universe of non-employer businesses by leveraging existing individual-level administrative and census records. Therefore, we already have a complete coverage of all (minority and non-minority) non-employer businesses. We will look into creating collection instruments, including in non-English languages, for the ABS. Language is not a barrier in NES-D since the administrative and census sources NES-D uses are available in multiple languages. To improve NES-D we may be able to provide more NAICS and geography details. Because NES-D covers the universe, it maximizes the chances of publishing at greater detail. To further expand content coverage of nonemployers we will look into the feasibility of including information from the administrative sources for household characteristics such as marital status, number of dependents, and health insurance arrangements. We will also look into additional characteristics related to gig economy to determine if non-employers work for a wage, use contractors or is a contractor for other companies as well as other characteristics such as age of business, whether non-employer is importer or exporter, and patenting activity.

Improving the Count of Children:

49. Research has shown that young children are consistently under-reported in the Decennial Census and the American Community Survey, and this under-reporting has implications for resource allocation. Further study and research on why children are left off the ACS Questionnaire and what can be done to make sure they are included is needed.

Improved communications on the ACS survey instrument are needed to remind parents or householders to include young children in the ACS. The reminder should be based on research that shows terms such as infants, newborns, toddlers, and preschoolers work to remind the survey respondents to include the youngest children when filling out ACS.

RECOMMENDATION: The NAC recommends that the Census Bureau test new language in the ACS internet survey instrument and the paper questionnaire that would: (a) overcome respondents' hesitancy to include young children; and (b) explain why it is important to include young children in responses to the ACS.

Census Bureau Response: The Census Bureau accepts the recommendation. The Census Bureau acknowledges the important work that has already been done to understand the complex issues behind the undercount of young children in the 2020 Census. For some time before the 2020 Census, work was underway that directly addressed this topic in the form of a dedicated internal task force, which was focused on improving the count of young children. Recommendations from the task force fed into a proposal to test modified roster questions for the ACS. The topic of rostering household members was included in the 2022 ACS Content Test. Staff from across the Census Bureau, including members of the task force and decennial staff, as well as staff from other federal agencies are providing their expertise and prior research experience to develop and test new rostering questions. The new rostering questions include specific probes directed at the omission of children.

50. Further evaluation by the Census Bureau is needed to assess which demographic groups are more likely to leave young children off the ACS survey response and identify the reasons why respondents do not include young children on the questionnaire. The Census Bureau should incorporate updates to the survey instructions and questions for the ACS and other Census products to address the identified barriers to identifying children.

RECOMMENDATION: The NAC recommends that the Bureau conduct a survey of parents with young children in the household to determine the prevalence of respondents not understanding that young children should be included in responses to the ACS questions requesting identification of all people in the household.

Census Response: The Census Bureau is unable to accept this recommendation, to the extent that the recommendation would require a separate survey of parents with young children. However, the Census Bureau will conduct further evaluation on the undercount of young children. In addition to the 2022 ACS Content Test, the Census Bureau will be applying knowledge gained from the Post Enumeration Survey (PES) and 2020 Census efforts related to counting young children. The Census Bureau plans to ask debriefing questions of respondents in early decade tests to understand the effectiveness of probes, in conjunction with the roster question, to improve the undercount of young children. The results of these efforts will be shared across demographic surveys from the Census Bureau ACS and Demographic Research Group as well as various research seminars.

The Census Bureau looks forward to continued work in this area.

51. **RECOMMENDATION:** The NAC recommends that the Census Bureau conduct focus groups with families of young children, to evaluate what factors motivate responded to include or exclude young children from Census surveys and the most effective language and messaging to use on Census forms and instructions to include all young children in the household regardless of whether the respondent is a parent, caregiver, or some other relationship.

Census Bureau Response: The Census Bureau accepts this recommendation. The Census Bureau created the Young Children Working Group, which is focused on the undercount of young children and improving data on this population in Census Bureau products. The Working Group will research ways to improve data on young children, which includes examining improvements in data collection. The Working Group is developing a research plan that includes qualitative approaches including focus groups.

Research and Data Disclosure:

52. While the Census Bureau says it reached almost every household on the Master Address File, by itself that is not a measure of accuracy or completeness. There are at least two major ways that the Bureau could reach every household on the MAF and still have significant undercounts. First, the MAF may have been incomplete. Second, there may have been significant "within household omissions" which are different from "whole household omissions," sometimes called unit omissions.

RECOMMENDATION: The NAC recommends that the Bureau evaluate "within household omissions" in the 2020 Census by age, race, and ethnicity, and other demographic characteristics and report back to the NAC.

Census Bureau Response: We are unable to accept this recommendation as written. The Census Bureau does not have a defensible methodology to identify "within household

omissions" in the 2020 Census. Previous research using the Post-Enumeration Survey demonstrated that decomposing person net coverage into whole household and within household omissions was very sensitive to how one defined within-household omissions. A major part of the complication was distinguishing whole household and within household omissions for households that split or merged between the census and the Post-Enumeration Survey Interview Day. Later this summer, we will release a PES report on census housing unit coverage which will discuss the coverage of the housing units in the 2020 Census.

53. **RECOMMENDATION:** The NAC recommends that the Bureau release census operational metrics for small sub-state areas, such as congressional districts, counties, cities, tribal areas, and census tracts, including data on incomplete enumerations (substitutions). This would allow stakeholders to see where variation in operational metrics may have an impact on the count of subgroups, including young children, Black, Latinx, Native American and Asian households and communities that are often undercounted.

Census Bureau Response: The Census Bureau partially accepts recommendation. During the self-response period for the 2020 Census, the Census Bureau released to the public response rates at various geographic levels below the state. We do, however, appreciate the NAC's interest in additional measures of quality for small sub-state areas. We are currently evaluating the feasibility of releasing selected other operational quality metrics later this year at the county and tract levels. Given our commitment to protecting the privacy and confidentiality of respondents, we need to carefully assess all disclosure risks and considerations against the 2020 privacy-loss budget before finalizing specific metrics for public release.

Household Pulse Survey Data:

54. The NAC commends the Census Bureau for improving the demographic data collection in the Household Pulse Survey by asking for demographic data on the ages of children in the household (by indicating if the household has children under age 5, ages 5-11, and ages 12-17). This is critical information for understanding, which groups are facing more hunger or more challenges finding childcare.

RECOMMENDATION: The NAC recommends that the Census Bureau report more Household Pulse Survey data by child age to provide access to people and organizations that do not have the capacity to work with the public use files. Additional tables that would be useful to include for households with children by child age are Child Tax Credit receipt, impact of lack of childcare on employment and work; experience with hunger, housing insecurity, and assistance receiving; and access to health care.

Census Bureau Response: The Census Bureau is unable to accept this recommendation at the present time. We appreciate the Committee's recommendation and agree that

additional tables such as those enumerated here would be useful. The Household Pulse Survey (HPS) was stood up quickly through the extraordinary efforts of existing staff. We are now working to mature and stabilize this program for the longer term. With the support of the FY22 funding, we are building a staff who can sustain this effort. As we do this we will be in a better position to consider expansion of the tables we produce, including those recommended here.

Use of Blended Base:

55. The Census Bureau is considering a new approach to developing its yearly Post-Census Population Estimates (at least for Vintage 2021 Estimates). The new method is called the blended base. This new approach would rely on updated detailed demographic data based on the 2010 Census blended with some data from the 2020 Census as the base for post census yearly population estimates.

RECOMMENDATION: The NAC recommends the Census Bureau provide information on how the process for the blended base was developed, including identification of the stakeholders who were consulted.

Census Bureau Response: The Census Bureau accepts this recommendation. Information on the development of the blended base is available in the Vintage 2021 methodology statement and release notes that were released in late December. The Census Bureau also has been engaged in ongoing stakeholder outreach via presentations to partnership groups (e.g. the Federal-State Cooperative for Population Estimates), advisory groups (e.g. the Census Scientific Advisory Committee, the JASON group, etc.), and other stakeholders (e.g. the Census Quality Reinforcement Network) as well as through webinars to specific data user groups and the public. We anticipate the development of additional technical documentation which would highlight our dedication to stakeholder outreach and transparency.

56. **RECOMMENDATION:** The NAC recommends that the Census Bureau provide a comparison of data from the blended base for 2022 estimates compared to using the 2020 Census as the base to understand whether the blended base would provide a more accurate source of estimates than a 2020 Census base specifically looking at the numbers for young children, Blacks, Hispanics and other racial and ethnic groups.

Census Bureau Response: The Census Bureau partially accepts this recommendation. At this time, we do not have a methodology in place to use the 2020 Census as the base. The outcome of research over the next year will help us to determine whether the 2020 Census data are suitable for use in the estimates base, and if they are, what methodological updates are necessary. When we are able to develop a 2020 Census base for our estimates for counties and higher levels of geography, we expect that differences between that base and the latest iteration of the blended base will be evaluated.

57. **RECOMMENDATION:** The NAC recommends that the Census Bureau consult with other federal agencies stakeholders and researchers (such as the George Washington Institute of Public Policy) to determine how the use of the blended base will affect the allocation of federal funding, including how it may shape the ACS and other data sources that agencies use for their work, and report their findings to the NAC.

Census Bureau Response: The Census Bureau is unable to accept this recommendation as written. Our intent is to continue to engage with stakeholders, including providing opportunities for data users to share feedback on the Vintage 2021 estimates in regard to our estimates methodology and the input data sources we use to support that method. This would include feedback on the blended base methodology. The feedback received will be considered and may be used to shape the development of our Vintage 2022 estimates series.